

January 16, 2007



VIA OVERNIGHT MAIL NO.: 8400 3526 6834

Universal Service Administrative Company
Letter Of Appeal
Billing, Collections, and Disbursements
2000 L. Street, N.W., Suite 200
Washington, D.C. 20036

**RE: Appeal of Universal Service Administrative Company's Denial of Request
for Relief from Strict Application of Universal Service Administrative
Company's Rules for Reporting and Contribution Obligations**

Filer 499 ID 818644

Dear Sir or Madam:

On November 21, 2006, the Universal Service Administrative Company ("USAC") considered and denied the request by NetOne International, Inc. ("NetOne") to be relieved of the hardship caused by strict application of USAC rules. This is NetOne's formal appeal of that decision.

The basis for this appeal is not legal. USAC has operated within the regulations that it has applied to NetOne. Netone's own reports were incorrect as has been pointed out by USAC. It is the effect of the error that is exaggerated. USAC's procedure would correct this error, eventually. We are not asking USAC to give up anything. All that we are asking is that USAC not penalize us in the short run when the error is self-correcting.

We have pointed out that this is a hardship on the company and it is an undue hardship. There is no reason to take a position that calls for Netone to pay erroneous amounts, which will be refunded later in the year. The only reasons to require such payments would be for USAC to enjoy use of the funds or to make a firm statement to NetOne. I doubt that this amount is significant to USAC although it is significant to NetOne. As for the firm statement, we get the message, but it was a mistake. Don't make us pay so heavily for the mistake. It just isn't necessary. NetOne has already made excess payments to USAC for approximately \$70,000. This has caused enough hardship to NetOne. Surely USAC doesn't want to add more hardship.

I sincerely hope that USAC managers are not insensitive about the repercussions of their actions? This appeal is based entirely on how rational and reasonable people would expect to resolve such an issue. Netone understands that is not possible to incorporate all

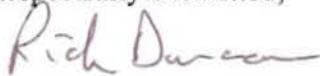
4037 METRIC DRIVE, SUITE 200
WINTER PARK, FLORIDA 32792
PHONE: (407) 384-4200 FAX: (407) 679-7553
www.netoneint.com

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circumstances into rules that are designed to be applied in mass. Occasionally, automated systems have to be re-directed with human intervention. That is what we are asking for now. We are appealing to the human beings that operate the system.

It is not difficult to amend or rescind an invoice or issue a credit. It can be done easily if there is a desire to do so. We hope that you will desire to do so. Please reconsider your decision, it has become very urgent now and we have created a situation that should never have been allowed. We accept the blame for this but must appeal to you for correction.

Respectfully submitted,



Rick Duncan, CMA
Controller
Netone International, Inc.
(407) 384-4200 x 1127
Email: Rduncan@netoneint.com

Attachments

cc: Telecom Compliance Service
Sapronov & Associates, P.C.
Attorneys for NetOne International, Inc.



Administrator's Decision on Contributor Appeal

November 21, 2006

VIA CERTIFIED MAIL

Rick Duncan, CMA
Controller
NetOne International, Inc.
4037 Metric Drive, suite 200
Winter Park, Florida 32792

Re: NetOne International, Inc. (Filer ID # 818644)

Dear Mr. Duncan:

The Universal Service Administrative Company (USAC) has completed an evaluation of the letter of appeal submitted on behalf of NetOne International, Inc. (NetOne) dated August 17, 2006 (Appeal). Your Appeal concerns USAC's method for determining NetOne's universal service billings reflected on its July 21, 2006 invoice.

Summary and Background

On July 21, 2006, USAC issued NetOne an invoice reflecting NetOne's July 2006 monthly universal service obligation. NetOne is appealing USAC's decision to estimate NetOne's third quarter projected collected revenue and determine NetOne's billings based on this estimate.

Federal Communications Commission ("FCC") regulations require carriers to submit an FCC Form 499-Q (Form 499-Q or Worksheet) reporting projected revenue for the upcoming quarter and require USAC to rely on revenue as reported when determining each companies' monthly universal service obligation for the upcoming quarter.¹ Further, when a carrier fails to file an FCC Form 499 by the due date, FCC regulations require USAC to estimate the carrier's revenue based upon previously reported revenue information in order to calculate universal service charges.² Because NetOne did not timely file a May 2006 Form 499-Q, USAC was correct to estimate NetOne's revenue.

¹ See 47 C.F.R. §§ 54.709 and 54.711.

² See 47 C.F.R. § 54.709(d).

The Form 499-Q had a due date of May 1, 2006 and a revision deadline of June 15, 2006. NetOne asserts that it filed its May 2006 499-Q "in the ordinary course" and explains that it has retained a third party company "to ensure compliance."³ USAC records indicate NetOne was sent on May 31, 2006, in advance of the June 15, 2006 revision deadline, a notice via electronic mail to the contact identified on NetOne's April 2006 Form 499-A advising NetOne that USAC had not received the May 2006 499-Q and that an estimate had been generated. Further, the notice advised NetOne if the Company did not contact USAC within seven days, the estimate generated from the 2006 Form 499-A would be used in lieu of the Company's May 499-Q filing. A copy of the email notification is enclosed for your reference.

Although NetOne failed to timely submit its May 2006 Form 499-Q, or a timely revision to the estimate, the FCC's annual reconciliation process provides NetOne with an opportunity for revising its 2006 revenue. NetOne is required to file a 2007 FCC Form 499-A by April 2, 2007.⁴ The 2007 Form 499-A will report NetOne's actual 2006 annual revenue. The annual true-up process will compare NetOne's reported actual 2006 revenue to the 2006 projected revenue as estimated by USAC for third quarter 2006, and reported by NetOne for the first, second, and fourth quarters of 2006. Therefore, assuming, but not concluding, that NetOne's billings should be adjusted, NetOne will receive adjustments or credits, as appropriate, on its invoices beginning in July 2007.

Explanation and Decision on Appeal: Denied.

Because USAC did not receive a timely-filed May 2006 Form 499-Q from NetOne, pursuant to FCC regulation, USAC relied on revenue previously reported by NetOne in order to estimate NetOne's third quarter 2006 revenue and billed NetOne based on this estimate.

³ See NetOne Appeal.

⁴ See 47 C.F.R. § 54.711.

Rick Duncan
November 21, 2006
Page 3

USAC's review indicates, for the reasons detailed herein, that it was correct in estimating NetOne's third quarter 2006 revenue and determining NetOne's universal service obligation based on that estimate. Accordingly, NetOne's appeal is denied.

If you wish to further appeal this decision, you may file an appeal with USAC or with the FCC. Detailed instructions for filing appeals are available at:

<http://www.universalservice.org/fund-administration/contributors/file-appeal>

Sincerely,

USAC

Universal Service Administrative Company

cc: Regina Dorsey, FCC Office of Managing Director
Hillary DeNigro, FCC Enforcement Bureau
Trent Harkrader, FCC Enforcement Bureau
Greg Guice, FCC Wireline Competition Bureau

August 17, 2006



VIA OVERNIGHT MAIL NO.: 4796884945

RECEIVED

AUG 30 2006
MEP

Universal Service Administrative Company
Letter Of Appeal
Billing, Collections, and Disbursements
2000 L. Street, N.W., Suite 200
Washington, D.C. 20036

RE: Appeal of Universal Service Administrative Company's Application of Its Rules to NetOne International, Inc.'s Universal Service Fund ("USF") Reporting and Contribution Obligations

Dear Sir or Madam:

On or about July 24, 2006, the undersigned applicant, NetOne International, Inc., ("NetOne") received an invoice from the Universal Service Administrative Company ("USAC") stating amounts due by NetOne for its 3rd quarter USF contribution requirements.¹

Pursuant to Option A.1 of USAC's rules, NetOne respectfully files this appeal of the Invoice and, in particular, of the application of the standard USAC true-up procedures for purposes of arriving at the amounts stated therein. NetOne is seeking this appeal, on a one-time basis because of the unique circumstances surrounding this matter, all as described further below.

In considering this appeal, please note that NetOne takes its USAC reporting obligations very seriously and has retained an administrator company, Telecom Compliance Service ("TCS"), to ensure compliance. *NetOne is requesting expedited processing of this appeal because of the substantial monetary hardship to NetOne that would otherwise result.*

By way of explanation, part one of the Invoice refers to the 499Q portion of NetOne's billing for the 499Q report that was due on May 1, 2006. USAC apparently did not receive this report from NetOne. As a result, instead of calculating the contribution amount due from NetOne based on the figures in that report, USAC instead applied its default estimates for the amounts due and, further, assumed that NetOne would not be eligible for the LIRE exemption. NetOne respectfully submits that this calculation is incorrect.

¹ Invoice number UBDI0000203353 dated July 21, 2006 from Universal Service Administrative Company to NetOne International, Inc. ("Invoice") (attached hereto at Exhibit "A").

4037 METRIC DRIVE, SUITE 200
WINTER PARK, FLORIDA 32792
PHONE: (407) 384-4200 FAX: (407) 679-7553
www.netoneint.com

Universal Service Administrative Company
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August 17, 2006
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In pertinent part, an amended May 1, 2006, NetOne 499Q report is attached and establishes that the LIRE exemption does apply. The attached 499Q is offered as an amendment so that it will supersede any 499Q that may yet arrive at USAC. For whatever reason, USAC did not receive the May 1, 2006 report. We (NetOne) suspect that this original filing may eventually arrive at USAC because our documents indicate that it was processed in the ordinary course. We cannot explain at this time why this report was not delivered to USAC, nor can we explain why TCS never received USAC's notice of non-responder. Had either one of these processes been accomplished successfully, NetOne would have been invoiced the correct amount from USAC and would not now be exposed to the financial hardship that this appeal seeks to minimize.

Part two of the referenced invoice refers to the April 1, 2005, 499A portion of our billing. The invoiced amount is based upon erroneous figures that NetOne supplied. This became apparent to us only after the invoiced amounts rose exponentially from \$3,500 to \$70,000 per month. Significantly, this was not made apparent to us until well after the 45-day window for filing amended reports under USAC's rules.

To show that NetOne is operating in good faith, NetOne paid in full the USAC invoice in question, by the due date of August 15, 2006. We understand that USAC has established policies and procedures but we respectfully request (and hope) that this appeal be:

- 1) Expedited;
- 2) Processed, using the accompanying returns; and
- 3) Approved before the next billing invoice is generated.

Otherwise, under USAC's standard procedures in such situations, NetOne will be compelled to await a true-up following the filing of its April 1, 2007, 499A in order to receive the credit that the attached amended reports² show NetOne to be entitled to at this time. Such a prolonged delay would significantly diminish the operating cash flow of NetOne and, indeed, of any carrier of our size. This would result in *significant financial hardship* for NetOne. For all of the above reasons, NetOne respectfully appeals the application of the standard USAC true-up procedures on this limited, one-time basis, and under the factually unique circumstances of this case.

² Attached hereto at Exhibit "B".

Universal Service Administrative Company
Letter Of Appeal
Billing, Collections, and Disbursements
August 17, 2006
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We have enclosed an original and one copy of this letter. Please file-stamp the copy letter and return it to us in the enclosed self-addressed envelope. Please contact us if further information or clarification is needed.

Respectfully submitted,

A handwritten signature in black ink that reads "Rick Duncan". The signature is written in a cursive, flowing style.

Rick Duncan, CMA
Controller

cc: Telecom Compliance Service
Sapronov & Associates, P.C.
Attorneys for NetOne International, Inc.

EXHIBIT "A"

INVOICE NUMBER UBDI0000203353



Statement Date: 07/21/2006
 Invoice Number: UBDI0000203353
 Filer 499 ID: 818644
 Balance Due USAC: \$ 70,748.29
 Amount Enclosed: 70,748.29

Net One International, Inc.
 Attention: Sandra Williams
 4037 Metric Drive, Suite 200
 Winter Park, FL, 32792

Mail Payment To:

Universal Service Administrative Company
1259 Paysphere Circle
Chicago, IL 60674

Address Change? See reverse side for instructions.

☐ If paying for multiple Filer 499 IDs, please check here and complete form on back.

Send top portion of statement with payment in enclosed envelope. Keep bottom portion for your records.

STATEMENT OF ACCOUNT

Date	Description	Charges	Credits
	Previous Balance	\$4,069.33	
07/14/2006	Late Filing Fee - 499A - 2006 499A	\$223.89	
07/14/2006	Schools & Libraries Support Mechanism Charges	\$10,727.75	
07/14/2006	Low Income Support Mechanism Charges	\$3,984.70	
07/14/2006	Rural Health Care Support Mechanism Charges	\$193.95	
07/14/2006	High Cost Support Mechanism Charges	\$20,479.80	
07/14/2006	Late Filing Fee - 499Q - May 2006 Q	\$223.89	
07/12/2006	Payment		(\$4,069.33)
07/14/2006	Low Income Support Mechanism Adjustment - 2006 499A	\$3,931.56	
07/14/2006	High Cost Support Mechanism Adjustment - 2006 499A	\$20,206.69	
07/14/2006	Schools & Libraries Support Mechanism Adjustment - 2006 499A	\$10,584.69	
07/14/2006	Rural Health Care Support Mechanism Adjustment - 2006 499A	\$191.37	
	BALANCE DUE USAC BY 8/15/2006	\$70,748.29	



Transactions occurring after 07/14/2006 are not reflected on this statement.

The Balance Due on this Statement represents your mandatory contributions to universal service support and constitutes a Debt owed to the United States as defined by 31 U.S.C § 3701, the Debt Collection Act of 1982 (Public Law 97-365), and the Debt Collection Improvement Act of 1996 (Public Law 104-134), as amended (the DCIA) and any amendments thereto. This Statement constitutes a demand for payment of the Balance Due in accordance with and pursuant to Federal Communications Regulations (47 C.F.R. § 1.1911) and the DCIA. Please refer to the reverse side of this Statement for important information and a description of your legal rights, obligations, and opportunities under the DCIA.

Statement Date	Invoice Number	Filer 499 ID	Balance Due USAC
07/21/2006	UBDI0000203353	818644	\$ 70,748.29
FORM 499Q DATA		PAYMENT INFORMATION	
This month's support mechanism charges were calculated using an FCC contribution factor of 0.105000 and the following revenue data:		Payment must be received by 08/15/2006 to avoid late payment charges.	
<u>May 2006 499Q</u>		Please remit ACH payments in a CCD+ format to ABA #071000505, Account #5590045653.	
120b	\$135,321.75	Payments must include your Company Name, Filer 499 ID, and Invoice Number to ensure timely posting.	
120c	\$984,120.50		
If the figures do not correspond with your records, please contact the 499 Data Collection Agent.			

EXHIBIT "B"

Attachments: NetOne April 1, 2006 499A, Amended;
NetOne May 1, 2006 499Q, Amended.

2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Approval by OMB
3060-0855

>>> Please read instructions before completing. <<<
Annual Filing -- due April 1, 2006

Block 1: Contributor Identification Information

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in Lines 104 or 112. See instructions.

101: Filer 499 ID: [If you don't know your number, contact the administrator at (888) 641-8722.]

818644

If you are a new filer, write "new" in this block and a Filer 499 ID will be assigned to you.

102: Legal name of reporting entity

Net One International, Inc.

103: IRS employer identification number

[Enter 9 digit number] 59-3448503

104: Name telecommunications service provider is doing business as

Net One International, Inc.

105: Telecommunications activities of filer [Select up to 5 boxes that best describe the reporting entity. Enter numbers starting with "1" to show the order of importance -- see directions.]

- | | | | |
|--|--|--|--|
| <input type="checkbox"/> All Distance | <input type="checkbox"/> CAP/CLEC | <input type="checkbox"/> Cellular/PCS/SMR (wireless telephony incl. by resale) | <input type="checkbox"/> Coaxial Cable |
| <input type="checkbox"/> Incumbent LEC | <input type="checkbox"/> Interexchange Carrier (IXC) | <input type="checkbox"/> Local Reseller | <input type="checkbox"/> Operator Service Provider (OSP) |
| <input type="checkbox"/> Payphone Service Provider | <input type="checkbox"/> Prepaid Card | <input type="checkbox"/> Private Service Provider | <input type="checkbox"/> Satellite Service Provider |
| <input type="checkbox"/> Shared-Tenant Service Provider / Building LEC | <input type="checkbox"/> SMR (dispatch) | <input checked="" type="checkbox"/> Toll Reseller | <input type="checkbox"/> Wireless Data |

If Other Local, Other Mobile or Other Toll is checked,
describe carrier type / services provided: →

☐ Other Local

☐ Other Mobile

☐ Other Toll

106.1: Holding company name (All affiliated companies must show the same name on this line.)

106.2: Holding company IRS employer identification number

[Enter 9 digit number]

107: FCC Registration Number (FRN) [<https://evarifoss2.fcc.gov/cores/CoresHome.html>]
[For assistance, contact the CORES help desk at 877-480-3201 or CORES@fcc.gov]

[Enter 10 digit number] 0004-3375-56

108: Management company [if carrier is managed by another entity]

109: Complete mailing address of reporting entity
corporate headquarters

Note: this address will be used for the ITSP FCC regulatory
fee billings unless the appropriate box is checked on Line 206.

Street 1
Street 2
Street 3
City

4037 Metric Drive
Suite 200
Winter Park

State:

FL

Zip (postal code)

32792

County if not USA

110: Complete business address for customer inquiries and
complaints

check if same address as Line 109 ☐

Street 1
Street 2
Street 3
City

4037 Metric Drive
Winter Park

State:

FL

Zip (postal code)

32792

County if not USA

111: Telephone number for customer complaints and inquiries [Toll-free number if available]

() -

ext -

112: List all trade names used in the past 3 years in providing telecommunications. Include all names by which you are known by customers.

a
b
c
d
e
f

g
h
i
j
k
l

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

Save time, avoid problems -- file electronically at

<http://fma.univis.com/filing.asp>

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FCC Form 499-A
April 2006

2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 2

Block 2-A: Regulatory Contact Information

201 Filer 499 ID [from Line 101]	818644		
202 Legal name of reporting entity [from Line 102]	Net One International, Inc.		
203 Person who completed this Worksheet	Keillah Spell/TCS		
204 Telephone number of this person	(678) 775-2248	ext -	
205 Fax number of this person	(678) 775-1188		
206 Email of this person Required if available	kspell@tcsteam.com		
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Office Email [required if available] Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA	Phone () - ext - Fax () -	
check if same name as Line 203 <input type="checkbox"/>	Sandra Williams	Suite 200	
check if same address as Line 109 <input type="checkbox"/>	4037 Metric Drive	FL 32792	
	Winter Park		
208 Billing address and billing contact person: [Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.]	Company Email [required if available] Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA	Attn First name Phone () - ext - Fax () -	
check if name and address same as Line 207 <input type="checkbox"/>	Sandra Williams	Suite 200	
check to use Line 208 information for FCC ITSP regulatory fee bill <input type="checkbox"/>	4037 Metric Drive	FL 32792	
	Winter Park		

Block 2-B: Agent for Service of Process

All carriers must complete Lines 209 through 213.

During the year, carriers must refile Blocks 1, 2 and 6 if there are any changes in this section. See Instructions.

209 D.C. Agent for Service of Process per 47 U.S.C. § 413	Company: TCS Corporate Services, Inc.		
210 Telephone number of D.C. agent	(888) 693-3300	ext -	
211 Fax number of D.C. agent	(678) 775-2254		
212 Email of D.C. agent Required if available	sgale@tcsteam.com		
213 Complete business address of D.C. agent for hand service of documents	Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA		
	1090 Vermont Ave NW, Ste 910		
	Washington	DC	20005
214 Local/alternate Agent for Service of Process (optional)	Company	Attn First name	Ext Last
215 Telephone number of local/alternate agent	() -	ext -	
216 Fax number of local/alternate agent	() -		
217 Email of local/alternate agent Required if available			
218 Complete business address of local/alternate agent for hand service of documents	Street 1 Street 2 Street 3 City State Zip (postal code) Country if not USA		

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April 2006

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2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 3

Block 2-C: FCC Registration and Contact Information

 Carriers must refile Blocks 1, 2 and 6.
If there are any changes in this section. See instructions.

219. Filer 499 ID: [from Line 101]	818644		
220. Legal name of reporting entity [from Line 102]	Net One International, Inc.		
221. Chief Executive Officer (or, highest ranking company officer if the filing entity does not have a chief executive officer)	First	MI	Last
	Samer Charani		
222. Business address of individual named on Line 221	Street 1		
check if same as Line 109 <input checked="" type="checkbox"/>	Street 2		
	Street 3		
	City	State	Zip (postal code) Country (if not USA)
223. Second ranking company officer, such as Chairman (Must be someone other than the individual listed on Line 221)	First	MI	Last
	Tareq Tujarr		
224. Business address of individual named on Line 223	Street 1		
check if same as Line 109 <input checked="" type="checkbox"/>	Street 2		
	Street 3		
	City	State	Zip (postal code) Country (if not USA)
225. Third ranking company officer, such as President or Secretary (Must be someone other than individuals listed on Lines 221 or 223)	First	MI	Last
	Sandra Williams		
226. Business address of individual named on Line 225	Street 1		
check if same as Line 109 <input checked="" type="checkbox"/>	Street 2		
	Street 3		
	City	State	Zip (postal code) Country (if not USA)
227. Indicate jurisdictions in which the filing entity provides telecommunications service. Include jurisdictions in which telecommunications service was provided in the past 15 months and jurisdictions in which telecommunications service is likely to be provided in the next 12 months.			
<input checked="" type="checkbox"/> Alabama	<input type="checkbox"/> Guam	<input checked="" type="checkbox"/> Massachusetts	<input checked="" type="checkbox"/> New York
<input checked="" type="checkbox"/> Alaska	<input checked="" type="checkbox"/> Hawaii	<input checked="" type="checkbox"/> Michigan	<input checked="" type="checkbox"/> North Carolina
<input type="checkbox"/> American Samoa	<input checked="" type="checkbox"/> Idaho	<input type="checkbox"/> Midway Atoll	<input checked="" type="checkbox"/> North Dakota
<input checked="" type="checkbox"/> Arizona	<input checked="" type="checkbox"/> Illinois	<input checked="" type="checkbox"/> Minnesota	<input type="checkbox"/> Northern Mariana Islands
<input checked="" type="checkbox"/> Arkansas	<input checked="" type="checkbox"/> Indiana	<input checked="" type="checkbox"/> Mississippi	<input checked="" type="checkbox"/> Ohio
<input checked="" type="checkbox"/> California	<input checked="" type="checkbox"/> Iowa	<input checked="" type="checkbox"/> Missouri	<input checked="" type="checkbox"/> Oklahoma
<input checked="" type="checkbox"/> Colorado	<input type="checkbox"/> Johnston Atoll	<input checked="" type="checkbox"/> Montana	<input checked="" type="checkbox"/> Oregon
<input checked="" type="checkbox"/> Connecticut	<input checked="" type="checkbox"/> Kansas	<input checked="" type="checkbox"/> Nebraska	<input checked="" type="checkbox"/> Pennsylvania
<input checked="" type="checkbox"/> Delaware	<input checked="" type="checkbox"/> Kentucky	<input checked="" type="checkbox"/> Nevada	<input type="checkbox"/> Puerto Rico
<input checked="" type="checkbox"/> District of Columbia	<input checked="" type="checkbox"/> Louisiana	<input checked="" type="checkbox"/> New Hampshire	<input type="checkbox"/> Rhode Island
<input checked="" type="checkbox"/> Florida	<input checked="" type="checkbox"/> Maine	<input checked="" type="checkbox"/> New Jersey	<input checked="" type="checkbox"/> South Carolina
<input checked="" type="checkbox"/> Georgia	<input checked="" type="checkbox"/> Maryland	<input checked="" type="checkbox"/> New Mexico	<input checked="" type="checkbox"/> South Dakota
			<input checked="" type="checkbox"/> Tennessee
			<input checked="" type="checkbox"/> Texas
			<input checked="" type="checkbox"/> Utah
			<input type="checkbox"/> U.S. Virgin Islands
			<input checked="" type="checkbox"/> Vermont
			<input checked="" type="checkbox"/> Virginia
			<input type="checkbox"/> Wake Island
			<input checked="" type="checkbox"/> Washington
			<input type="checkbox"/> West Virginia
			<input type="checkbox"/> Wisconsin
			<input checked="" type="checkbox"/> Wyoming

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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FCC Form 499-A

April 2008

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2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 4

Block 3: Carrier's Carrier Revenue Information

301	Filer 499 ID [from Line 101]	818644			
302	Legal name of reporting entity [from Line 102]	Net One International, Inc.			
Report billed revenues for January 1 through December 31, 2005. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.		Total Revenues	If breakouts are not book amounts, enter whole percentage estimates		Breakouts
See instructions regarding percent interstate & international.		(a)	Interstate (b)	International (c)	Interstate Revenues (d) International Revenues (e)
Revenues from Services Provided for Resale as Telecommunications by Other Contributors to Federal Universal Service Support Mechanisms					
<u>Fixed local service</u>					
Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXCs					
303.1	Provided as unbundled network elements (UNEs)				
303.2	Provided under other arrangements				
Per-minute charges for originating or terminating calls					
304.1	Provided under state or federal access tariff				
304.2	Provided as unbundled network elements or other contract arrangement				
305	Local private line & special access service				
306	Payphone compensation from toll carriers				
307	Other local telecommunications service revenues				
308	Universal service support revenues received from Federal or state sources				
<u>Mobile services (including wireless telephony, paging & messaging, and other mobile services)</u>					
309	Monthly, activation, and message charges except toll				
<u>Toll services</u>					
310	Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)				
311	Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)				
312	Long distance private line services				
313	Satellite services				
314	All other long distance services				

Note: As stated in the instructions, for all revenues reported on this page, you must retain the Filer 499 ID and contact information for the associated customers. You must verify that each of these customers was a direct contributor to the federal universal service support mechanism for calendar year 2005 and that the customer is purchasing service for resale as telecommunications. These records must be made available to the administrator or the FCC upon request. The FCC website contains information on federal universal service contributors. (See instructions.)

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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FCC Form 499-A
April 2005

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2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 5

Block 4-A: End-User and Non-Telecommunications Revenue Information

401 Filer 499 ID [from Line 101]	818644				
402 Legal name of reporting entity [from Line 102]	Net One International, Inc.				
Report billed revenues for January 1 through December 31, 2005. Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international.	Total Revenues	If breakouts are not book amounts, enter whole percentage estimates		Breakouts	
	(a)	Interstate (b)	International (c)	Interstate Revenues (d)	International Revenues (e)
Revenues from All Other Sources (end-user telecom. & non-telecom.)					
403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions					
Fixed local services					
Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PICC charges					
404.1 Provided at a flat rate including interstate toll service					
404.2 Provided without interstate toll included (see instructions)					
405 Tariffed subscriber line charges and PICC charges levied by a local exchange carrier on a no-PIC customer					
406 Local private line & special access service					
407 Payphone coin revenues (local and long distance)					
408 Other local telecommunications service revenues					
Mobile services (including wireless telephony, paging & messaging, and other mobile services)					
409 Monthly and activation charges					
410 Message charges including roaming, but excluding toll charges					
Toll services					
411 Prepaid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards					
412 International calls that both originate and terminate in foreign points		0%	100%		
413 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenues reported on Line 412					
414 Ordinary long distance (direct-dialed MTS, customer toll-free (800/888 etc.) service, "10-10" calls, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)	6,537,680			634,569	5,446,500
415 Long distance private line services					
416 Satellite services					
417 All other long distance services					
418 Revenues other than U.S. telecommunications revenues, including information services, inside wiring maintenance, billing and collection customer premises equipment, published directory, dark fiber, Internet access, cable TV program transmission, foreign carrier operations, and non-telecommunications revenues (See instructions.)					

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001.

Save time, avoid problems -- file electronically at

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FCC Form 499-A
April 2006

CLEAR PAGE

2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 6

Block 4-B: Total Revenue and Uncollectible Revenue Information

	Total Revenues (a)	Breakouts:	
		Interstate Revenues: (d)	International Revenues: (e)
419 Gross billed revenues from all sources (Incl. reseller & non-telecom.) [Lines 303 through 314 plus Lines 403 through 418]	\$6,537,680	\$634,569	\$5,446,500
420 Gross universal service contribution base amounts [Lines 403 through 411 Lines 413 through 417]. See Figure 4 in instructions.	\$6,537,680	\$634,569	\$5,446,500
421 Uncollectible revenue/bad debt expense associated with gross billed revenues amounts shown on Line 419 [See Instructions Page 26]	\$848,016	\$93,282	\$686,893
422 Uncollectible revenue/bad debt expense associated with universal service contribution base amounts shown on Line 420	\$848,016	93,282	\$686,893
423 Net universal service contribution base revenues: [Line 420 minus line 422]	\$5,689,664	\$541,287	\$4,759,607

Block 5: Additional Revenue Breakouts

501 Filer 499 ID (from Line 101) 818644

502 Legal name of reporting entity (from Line 102) Net One International, Inc.

Filers that report revenues in Block 3 and Block 4 must provide the percentages requested in Lines 503 through 510. See page 27 of instructions for limited exceptions.

Percentage of revenues reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

		Block 3 Carrier's Carrier (a)	Block 4 End-User Telecom. (b)
503 Southeast:	Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee, and U.S. Virgin Islands	%	20 %
504 Western:	Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming	%	9 %
505 West Coast:	California, Hawaii, Nevada, American Samoa, Guam, Johnston Atoll, Midway Atoll, Northern Mariana Islands, and Wake Island	%	22 %
506 Mid-Atlantic:	Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, and West Virginia	%	16 %
507 Mid-West:	Illinois, Indiana, Michigan, Ohio, and Wisconsin	%	14 %
508 Northeast:	Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, and Vermont	%	9 %
509 Southwest:	Arkansas, Kansas, Missouri, Oklahoma, and Texas	%	10 %
510 Total	[Percentages must add to 0 or 100.]	%	100 %

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4-B, Line 420 but may be excluded from a filer's TRS, NANPA, LNP, and FCC interstate telephone service provider regulatory fee contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below. As stated in the instructions, you must have in your records the FCC Filer 499 ID for each customer whose revenues are included on Line 511. (See instructions.)

	(a) Total Revenues	(b) Interstate and International
Revenues from resellers that do not contribute to Universal Service	\$	\$

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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FCC Form 499-A
April 2006

CLEAR PAGE

2006 FCC Form 499-A Telecommunications Reporting Worksheet (Reporting Calendar 2005 Revenues)

Page 7

Block 6: CERTIFICATION: to be signed by an officer of the filer

601 Filer 499 ID [from Line 101]

818644

602 Legal name of reporting entity [from Line 102]

Net One International, Inc.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service Administrator will determine which entities meet the *de minimis* threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service ☐TRS ☐NANPA ☐LNP Administration ☐

Provide explanation below:

604 Please indicate whether the reporting entity is

State or Local Government Entity ☐I.R.C. § 501 Tax Exempt ☐PUHCA § 34 (a)(1) Exempt ☐

605 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☐

I certify that I am an officer of the above-named reporting entity as defined on page 28 of the instructions, that I have examined the foregoing report and, to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year. In addition, I swear, under penalty of perjury, that all requested identification registration information has been provided and is accurate. If the above-named reporting entity is filing on a consolidated basis, I certify that this filing incorporates all of the revenues for the consolidated entities for the entire year and that the filer adhered to and continues to meet the conditions set forth in Section II-B of the instructions.

606 Signature



607 Printed name of officer

First Sandra MI Last Williams

608 Position with reporting entity

Treasurer

609 Business telephone number of officer

(407) - 384-4200 ext - 11611

610 Email of officer || Required if available ||

sandrawilliams@netoneint.com

611 Date

8/17/06

612 Check those that apply:



Original April 1 filing for year



New filer, registration only



Revised filing with updated registration



Revised filing with updated revenue data

Do not mail checks with this form. Send this form to: **Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036**For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (888) 641-8722 or via email: Form499@universalservice.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. § 1001

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April 2006

FCC Form 499-Q Telecommunications Reporting Worksheet

Quarterly Filing for Universal Service Contributors

>>> Please read instructions before completing <<<

Approval by OMB
3060-0855

Block 1: Contributor Identification Information

101

Filer 499 ID

818644

102 Legal name of reporting entity

Net One International, Inc.

103 IRS employer identification number

59-3448503

104 Name telecommunications service provider is doing business as

Net One International, Inc.

105 Holding company [All affiliated companies should show same name here.]

106 FCC Registration Number (FRN)

0004-3375-56

107 Complete mailing address of reporting entity's corporate headquarters

4037 Metric Drive, Suite 200

Winter Park

FL

32792

Block 2: Contact Information

108 Person who completed this worksheet

Keillah Spell/TCS

109 Telephone number of this person

(678-775-2248

110 Fax number of this person

(678) 775-1188

111 Email of this person

kspell@tcsteam.com

112 Billing address and billing contact person:
[Bills for Universal Service contributions will be sent to this address.]

4037 Metric Drive, Suite 200

Winter Park

FL

32792

Block 3: Contributor Historical and Projected Revenue Information

113 Year of historical revenue information

114 Indicate which quarterly filing this represents

Filing due
☐ February 1
☒ May 1
☐ August 1
☐ November 1

Historical revenues for
October 1 - December 31 (prior year)
January 1 - March 31
April 1 - June 30
July 1 - September 30

Projected revenues for
April 1 - June 30
July 1 - September 30
October 1 - December 31
January 1 - March 31 (following calendar year)

Historical billed revenues with no allowance or deductions for uncollectibles. See instructions.

Total Revenues
(a)

Interstate Revenues
(b)

International Revenues
(c)

115 Telecommunications provided to other universal service contributors for resale as telecommunications

\$0

\$0

\$0

116 End-user telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues

\$1,770,417

\$161,632

\$1,490,319

117 All other goods and services

\$0

Column (b) and (c) not requested

118 Gross-billed revenues from all sources [sum of above]

\$1,770,417

for Lines 117 and 118

119 Projected gross-billed end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues

\$161,632

\$1,490,319

120 Projected collected end-user interstate and international telecommunications revenues including any pass-through charges for universal service contributions, but excluding international-to-international revenues

\$129,306

\$1,192,255

Block 4: CERTIFICATION: to be signed by an officer of the reporting entity

121 I certify that the revenue data contained herein are privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☐

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true, that said Worksheet is an accurate statement of the affairs of the above-named company for the quarter and that the projections of gross-billed and collected revenues represent a good-faith estimate based on company procedures and policies.

122 Signature

Sandra Williams

123 Printed name of officer

Sandra Williams

124 Position with reporting entity

Treasurer

125 Date

8/17/06

126 This filing is:

☐ Original filing

☒ Revised filing [revisions due within 45 days of original filing deadline]

Do not mail checks with this form. Send this form to: Form 499 Data Collection Agent c/o USAC 2000 L Street, N.W. Suite 200 Washington DC, 20036

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Info: (888) 641-8722 or via e-mail: Form499@universalservice.org

PERSONS WILLFULLY MAKING FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

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<http://form499.universalservice.org/>

FCC Form 499-Q
September 2005

RESET

Administrator's Decision on Contributor Appeal

November 21, 2006

VIA CERTIFIED MAIL

Rick Duncan, CMA
Controller
NetOne International, Inc.
4037 Metric Drive, suite 200
Winter Park, Florida 32792

Re: NetOne International, Inc. (Filer ID # 818644)

Dear Mr. Duncan:

The Universal Service Administrative Company (USAC) has completed an evaluation of the letter of appeal submitted on behalf of NetOne International, Inc. (NetOne) dated August 17, 2006 (Appeal). Your Appeal concerns USAC's method for determining NetOne's universal service billings reflected on its July 21, 2006 invoice.

Summary and Background

On July 21, 2006, USAC issued NetOne an invoice reflecting NetOne's July 2006 monthly universal service obligation. NetOne is appealing USAC's decision to estimate NetOne's third quarter projected collected revenue and determine NetOne's billings based on this estimate.

Federal Communications Commission ("FCC") regulations require carriers to submit an FCC Form 499-Q (Form 499-Q or Worksheet) reporting projected revenue for the upcoming quarter and require USAC to rely on revenue as reported when determining each companies' monthly universal service obligation for the upcoming quarter.¹ Further, when a carrier fails to file an FCC Form 499 by the due date, FCC regulations require USAC to estimate the carrier's revenue based upon previously reported revenue information in order to calculate universal service charges.² Because NetOne did not timely file a May 2006 Form 499-Q, USAC was correct to estimate NetOne's revenue.

¹ See 47 C.F.R. §§ 54.709 and 54.711.

² See 47 C.F.R. § 54.709(d).

The Form 499-Q had a due date of May 1, 2006 and a revision deadline of June 15, 2006. NetOne asserts that it filed its May 2006 499-Q "in the ordinary course" and explains that it has retained a third party company "to ensure compliance."³ USAC records indicate NetOne was sent on May 31, 2006, in advance of the June 15, 2006 revision deadline, a notice via electronic mail to the contact identified on NetOne's April 2006 Form 499-A advising NetOne that USAC had not received the May 2006 499-Q and that an estimate had been generated. Further, the notice advised NetOne if the Company did not contact USAC within seven days, the estimate generated from the 2006 Form 499-A would be used in lieu of the Company's May 499-Q filing. A copy of the email notification is enclosed for your reference.

Although NetOne failed to timely submit its May 2006 Form 499-Q, or a timely revision to the estimate, the FCC's annual reconciliation process provides NetOne with an opportunity for revising its 2006 revenue. NetOne is required to file a 2007 FCC Form 499-A by April 2, 2007.⁴ The 2007 Form 499-A will report NetOne's actual 2006 annual revenue. The annual true-up process will compare NetOne's reported actual 2006 revenue to the 2006 projected revenue as estimated by USAC for third quarter 2006, and reported by NetOne for the first, second, and fourth quarters of 2006. Therefore, assuming, but not concluding, that NetOne's billings should be adjusted, NetOne will receive adjustments or credits, as appropriate, on its invoices beginning in July 2007.

Explanation and Decision on Appeal: Denied.

Because USAC did not receive a timely-filed May 2006 Form 499-Q from NetOne, pursuant to FCC regulation, USAC relied on revenue previously reported by NetOne in order to estimate NetOne's third quarter 2006 revenue and billed NetOne based on this estimate.

³ See NetOne Appeal.

⁴ See 47 C.F.R. § 54.711.

Rick Duncan
November 21, 2006
Page 3

USAC's review indicates, for the reasons detailed herein, that it was correct in estimating NetOne's third quarter 2006 revenue and determining NetOne's universal service obligation based on that estimate. Accordingly, NetOne's appeal is denied.

If you wish to further appeal this decision, you may file an appeal with USAC or with the FCC. Detailed instructions for filing appeals are available at:

<http://www.universalservice.org/fund-administration/contributors/file-appeal>

Sincerely,

USAC

Universal Service Administrative Company

cc: Regina Dorsey, FCC Office of Managing Director
Hillary DeNigro, FCC Enforcement Bureau
Trent Harkrader, FCC Enforcement Bureau
Greg Guice, FCC Wireline Competition Bureau